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20 UNITED STATES BANKRUPTCY COURT
21 NORTHERN DISTRICT OF CALIFORNIA
22 SAN FRANCISCO DIVISION

23 PG&E Corporation

Case No. 19-30088

24 -and-

Chapter 11

25 Pacific Gas and Electric Company,
26 Debtors.

(Lead Case)

(Jointly Administered)

27 ☐ Affects PG&E Corporation

28 ☐ Affects Pacific Gas and Electric
Company

☒ Affects both Debtors

*All papers shall be filed in the Lead Case,
No. 19-30088

**OSMOSE UTILITIES SERVICES, INC.'S
JOINDER IN BLACK & VEATCH
CONSTRUCTION, INC.'S OPPOSITION
TO THE OFFICIAL COMMITTEE OF
TORT CLAIMANTS' MOTION TO
ESTABLISH PROCEDURES FOR
DISCOVERY PRECEDING PLAN
CONFIRMATION
RE: [Dkt. Nos. 5840; 6011]**

Date: March 10, 2020

Time: 10:00 AM (Pacific Time)

Place: Courtroom 17

450 Golden Gate Ave., 16th Fl.
San Francisco, CA 94102

Osmose Utilities Services, Inc. ("Osmose"), by and through undersigned counsel, hereby files this joinder (the "Joinder") to *Black & Veatch Construction, Inc.'s Opposition to the Official Committee of Tort Claimants' Motion to Establish Procedures for Discovery Preceding Plan Confirmation* [Dkt. No. 6011] (the "Opposition") and states the following:

JOINDER

Osmose hereby joins in the Opposition filed by Black & Veatch Construction, Inc. ("BVCI"). Osmose agrees with BVCI's views regarding the impropriety of the *Motion to Establish Procedures for Discovery Preceding Plan Confirmation* [Dkt. No. 5840] (the "Motion") filed by the Official Committee of Tort Claimants on February 19, 2020. As set forth in the Opposition, the procedures requested in the Motion contravene both FED. R. CIV. P. 45 (as made applicable through FED. R. BANKR. P. 9016) and FED. R. BANKR. P. 9031.

CONCLUSION

WHEREFORE, Osmose respectfully requests that the Court enter an order (i) granting the relief requested in the Opposition and this Joinder; (ii) denying the Motion; and (iii) granting Osmose such other and further relief as is just and proper.

[Signature on following page]

1 Dated: March 3, 2020

TROUTMAN SANDERS LLP

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3 By: /s/ Katharine L. Malone

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